

FILED

JUN 27 2013

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
THERESA L. MOORE,)
)
Defendant.)

4 : 13CR 00259 JAR

INDICTMENT

Count 1 – Wire Fraud

The Grand Jury charges that:

1. From at least in or around July 2009 through as late as in or around June 2012, Defendant Theresa L. Moore, with the assistance of others unknown to the Grand Jury, devised and executed a scheme and artifice to defraud and to obtain money from other persons by means of material false and fraudulent pretenses, representations, and promises in that Moore, using various aliases, claimed to be a member of, or associated with, law enforcement and the legal profession and induced others to pay her money by convincing them that she could assist them, or had assisted them, with various legal matters.

2. With the assistance of others unknown to the Grand Jury, Defendant Moore executed her fraud scheme by contacting victims by telephone and making false representations to victims about non-existent legal matters. Moore was able to convince victims to pay money to her and others by wire transfer, by mailing checks, and by hand delivering cash.

3. In or around July 2009, Defendant Moore met victim K.B., an elderly widower, through a telephone dating service.

4. Soon thereafter, in furtherance of the fraud scheme, Moore and others unknown to the Grand Jury, using various aliases, contacted K.B. by telephone to inform K.B. that he was a victim of identity theft. During the phone calls, Moore and her associates informed K.B. that he was entitled to restitution and that he had to pay money up front in order to collect his restitution payment.

5. At other times, in furtherance of the fraud scheme, Moore and others unknown to the Grand Jury, using various aliases, contacted K.B. by telephone to inform K.B. that he would be receiving money as part of a legal settlement and that he had to pay money up front in order to collect his settlement.

6. In reliance on these false representations, K.B. made multiple payments to Moore in the form of checks, wire transfers through Western Union and through Money Gram, and cash.

7. Over about a three year period, K.B. paid Moore in excess of \$60,000 as a result of Moore's false and fraudulent representations.

8. On or about June 12, 2012, within the Eastern District of Missouri and elsewhere,

THERESA L. MOORE,

the Defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures or sounds, namely a wire funds transfer via Money Gram in the amount of \$448.00, sent from a Shop N Save grocery store in Springfield, Illinois to a Money Gram kiosk located inside a Schnucks grocery store in St. Louis, Missouri.

In violation of Title 18, United States Code, Sections 1343 and 2.

Count 2 – Wire Fraud

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 7 of Count 1 of this Indictment are restated and incorporated as if fully set forth herein.

2. On or about June 14, 2012, within the Eastern District of Missouri and elsewhere,

THERESA L. MOORE,

the Defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures or sounds, namely a wire funds transfer via Money Gram in the amount of \$486.00, sent from a Shop N Save grocery store in Springfield, Illinois to a Money Gram kiosk located inside a Schnucks grocery store in St. Louis, Missouri.

In violation of Title 18, United States Code, Sections 1343 and 2.

Count 3 – Wire Fraud

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 and 2 of Count 1 of this Indictment are restated and incorporated as if fully set forth herein.

2. On or about May 27, 2011, in furtherance of her fraud scheme, Defendant Moore and at least one other person unknown to the Grand Jury contacted victim J.N. by telephone and falsely stated to J.N. that there were several warrants out for the arrest of J.N.'s adult daughter

P.N., who had developmental learning disabilities. Moore and her associate falsely stated to J.N. that Moore had paid fines on behalf of P.N. and that J.N. needed to reimburse Moore.

3. In reliance on the false representations, J.N. wired \$752 to Moore.

4. Over the next two and a half weeks, J.N. received several more telephone calls from Moore. During these phone conversations, Moore falsely stated to J.N. that Moore needed money for various reasons related to P.N.'s criminal case, including fines, court fees, bond, and attorney fees.

5. In reliance on Moore's false representations, J.N. made additional payments to Moore, including another wire transfer and several cash payments. J.N. also attempted to make a payment to Moore by credit card and provided Moore with credit card account numbers.

6. Over a period of more than two weeks, J.N. paid Moore in excess of \$20,000 as a result of Moore's false and fraudulent representations.

7. On or about May 27, 2011, within the Eastern District of Missouri and elsewhere,

THERESA L. MOORE,

the Defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures or sounds, namely a wire funds transfer via Western Union in the amount of \$752.00, sent from a G & W Foods store in Van Buren, Missouri to a Western Union agent located at A-1 Paging Service in St. Louis, Missouri.

In violation of Title 18, United States Code, Sections 1343 and 2.

Count 4 – Wire Fraud

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 6 of Count 3 of this Indictment are restated and incorporated as if fully set forth herein.

2. On or about May 28, 2011, within the Eastern District of Missouri and elsewhere,

THERESA L. MOORE,

the Defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud, and in attempting to do so, did knowingly cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures or sounds, namely a wire funds transfer via Western Union in the amount of \$766.32, sent from a Dierbergs grocery store in Florissant, Missouri to a Western Union agent located at a Schnucks grocery store in St. Louis, Missouri.

In violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL.

FOREPERSON

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